

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

GREAT LAKES DREDGE & DOCK
COMPANY, LLC,

Plaintiff,

vs.

PHILLY SHIPYARD, INC.,

Defendant.

Case No.: 2:24-cv-06198

**GREAT LAKES DREDGE & DOCK COMPANY, LLC’S MOTION
FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, Great Lakes Dredge & Dock Company, LLC (“Great Lakes”) hereby moves this Court to issue a temporary restraining order and preliminary injunction.

Specifically, Great Lakes requests that the Court enter a temporary restraining order enjoining Philly Shipyard, Inc. (“Philly”) from taking any action to remove the ship that Great Lakes hired Philly to build (the “Vessel”) from its position in the dock and floating it into the harbor until the Vessel is ready to be outfitted according to the original, agreed-upon build strategy.

Further, Great Lakes requests that the Court enter a preliminary injunction (1) enjoining Philly from taking any action to remove the Vessel from its position in the dock and floating it into the harbor until the Vessel is ready to be outfitted according to the original, agreed-upon build strategy; (2) enjoining Philly from diverting shared resources from the Vessel to other projects in the shipyard; and (3) requiring Philly to (a) develop and maintain a fully resource-loaded and logic-linked schedule consistent with the VCA; (b) comply with its duty of diligence, including putting the necessary resources to the construction of the Vessel to achieve timely delivery; and (c) comply with its duty to take actions to recover the project schedule, including placing all

purchase orders required under the VCA within 60 days and paying for certain materials to be shipped by air.

In support of this motion, Great Lakes relies upon the accompanying Brief in Support and exhibits.

Date: November 20, 2024

Respectfully submitted,

/s/ Wesley A. Prichard

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing documents has been served on all known counsel of record via the Court's CM/ECF system.

/s/ Wesley A. Prichard
Wesley A. Prichard